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Change Number M-13-94-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink	Date May 1, 1995
Originator Jack W. Donnelly		Phone 736-3013
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title M-13-00 Modification (1994 Refocusing Negotiations)		
Description/Justification of Change <u>Justification of Change:</u> In 1989, when the Hanford Federal Facility Agreement and Consent Order was signed by the U. S. Department of Energy (USDOE), Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology), 78 operable units existed throughout the Hanford Site. The Site was divided into four National Priorities List (NPL) Areas, the 100 NPL Area, 200 NPL Area, 300 NPL Area, and 1100 NPL Area. The 100 NPL Area contained 25 operable units. The 200 NPL Area contained 43 operable units. The 300 NPL Area contained 6 operable units. The 1100 NPL Area contained 4 operable units. See attached Description/Justification of Change continued on Page 2.		
Impact of Change 1. Complete 100 NPL Area pre-Record of Decision (pre-ROD) characterization/investigation ahead of schedule (December 31, 1999); 2. Complete 300 NPL Area pre-ROD characterization/investigation ahead of schedule (December 31, 1999); 3. Complete 200 NPL Area pre-ROD characterization/investigation by December 31, 2008 versus September 30, 2005; 4. Modification of M-15-00 required; 5. Milestones/reaffirmation more reflective of public, stakeholder, tribal values; 6. Emphasis on groundwater treatment/containment/extraction; 7. Closure/Postclosure of the 6 Tank Farm Operable Units (200-UP-3, 200-TP-5, 200-TP-6, 200-RO-4, 200-PO-3, 200-BP-7) will be addressed under M-45-00; and 8. No other TPA impacts are expected.		
Affected Documents 1. Hanford Federal Facility Agreement and Consent Order, Action Plan and Appendices B, C and D. 2. Change Control Form Number M-13-93-06, Jan. 1994.		
Approvals for <u>John P. Wagoner</u> <u>5/1/95</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Date <u>Chad Clark</u> <u>5/8/95</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Date <u>Margaret Lane</u> <u>5/9/95</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Date EPA Ecology		

Description/Justification of Change (continued)

Justification of Change (continued):

The current status in each NPL Area is as follows:

100 NPL Area: 18 of the 22 operable units either have existing RI/FS (RFI/CMS) Work Plans or have existing milestones for further work in CY 1994. Cleanup actions are underway or complete at 4 operable units.

200 NPL Area: 6 of the 42 operable units either have existing RI/FS (RFI/CMS) Work Plans or have existing milestones to have further work in CY 1994. Cleanup actions are underway or complete at 4 operable units.

300 NPL Area: 6 of the 6 operable units either have existing RI/FS (RFI/CMS) Work Plans or have existing milestones for further work in CY 1994. Cleanup actions are underway or complete at 2 operable units.

1100 NPL Area: 4 of the 4 operable units have a remedial action (record of decision).

200 NPL Area Tank Farms: 6 of the 42 operable units in the 200 NPL Area are Tank Farm Operable Units; Closure/Postclosure of these units is addressed under M-45-00 and will not be within the scope of M-13-00.

Under (the original) M-15-00, the RI/FS (RFI/CMS) process is to be completed at all operable units by 2005. To achieve M-15-00, M-13-00 was established to set a rate of 6 RI/FS (RFI/CMS) Work Plans/year. However, based on public comment and values, tribal and stakeholder comment and values, environmental restoration goals, the need to achieve cost efficiencies, recommendations of the Tank Waste Task Force and the Future Site Uses Working Group, there is a need to modify M-13-00. This modification is expected to better meet program goals and objectives while ensuring adequate resources are dedicated to cleanup near the Columbia River; remediate groundwater plumes impacting the river; and to demonstrate progress and commitment in cleaning up Hanford effectively and efficiently. USDOE M-13-00 commitments not modified by this change remain in effect and include M-13-06A and M-13-00C. M-13-00C is to be satisfied by submittals for the following existing milestones: M-13-07, M-13-08, M-13-09, M-13-80, M-13-81, and M-13-81A.

Description of Change:

1. THE FOLLOWING MILESTONES WILL BE DELETED:

MILESTONE	DESCRIPTION	DATE
M-13-00D	Submit 6 RI/FS (RFI/CMS) Work Plans	12/31/95
M-13-00E	Submit 6 RI/FS (RFI/CMS) Work Plans	12/31/96
M-13-00F	Submit 6 RI/FS (RFI/CMS) Work Plans	12/31/97
M-13-00G	Submit 6 RI/FS (RFI/CMS) Work Plans	12/31/98
M-13-00H	Submit 6 RI/FS (RFI/CMS) Work Plans	12/31/99

With the commitment of completing the RI/FS (RFI/CMS) Process at the 100 and 300 NPL Areas by 12/31/99, and the 200 NPL Area by 12/31/2008 (See also M-15-00 commitments), the following milestones will be established:

Description/Justification of Change (continued)

2. 100 NPL AREA:

MILESTONE	DESCRIPTION	DATE
M-13-00I	Submit planning documentation necessary to complete the RI/FS Process for 100-FR-2, 100-KR-2 (including the former 100-KR-3) (see Note 1).	12/31/95
M-13-00J	Submit planning documentation necessary to complete the RI/FS Process for 100-IU-2, and 100-IU-6 (see Note 1).	12/31/96

Note 1: Documentation for M-13-00I and M-13-00J may include plans consistent with the Hanford Past Practice Strategy. The purpose of these plans is to provide sufficient information to meet the requirements of the RI/FS process to support appropriate cleanup decisions for the remaining 100 NPL Area Operable Units. Completion of the RI/FS (pre-ROD) process shall be satisfied by submittal of the proposed plan.

3. 200 NPL AREA:

MILESTONE	DESCRIPTION	DATE
M-13-11	Submit 200-PO-2 RFI/CMS, Closure/Postclosure Work Plan.	06/30/98
M-13-12	Submit 200-PO-4 RFI/CMS, Closure/Postclosure Work Plan.	10/31/98
M-13-14	Submit 200-IU-3 RFI/CMS, Closure/Postclosure Work Plan.	02/28/99
M-13-15	Submit 200-RO-1 RFI/CMS, Closure/Postclosure Work Plan.	06/30/99
M-13-16	Submit 200-PO-5 RFI/CMS, Closure/Postclosure Work Plan.	10/31/99
M-13-17	Submit 200-SO-1 RFI/CMS, Closure/Postclosure Work Plan.	02/28/2000

Each Work Plan above will include a coordinated past practice site investigation/RCRA Closure/Postclosure/RCRA Corrective Action approach in order to implement applicable requirements within a single document.

The RFI/CMS, Closure/Postclosure Work Plan will be the first of several necessary submittals for completing the RFI/CMS and RCRA closure/postclosure processes for an individual operable unit. It will include a schedule for the submittal of subsequent documents.

The information necessary for performing RCRA closures/postclosures within an operable unit will be provided in various RFI/CMS documents. The initial work plan will contain a Sampling and Analysis Plan (SAP) for the associated RCRA units and it will outline the manner in which RCRA Closure/Postclosure Plan requirements will be met in the work plan and subsequent documents. The selected closure/postclosure method and associated design details will (unless otherwise agreed to by the parties) be submitted as part of the CMS report at a later date, as specified in the work plan.

Description/Justification of Change (continued)

The proposed closure/postclosure activities contained in the CMS report will: (1) meet RCRA closure/postclosure standards and requirements, (2) be consistent with closure/postclosure requirements specified in the Hanford Site-Wide (RCRA) permit, and (3) be coordinated with recommended remedial action(s) for the associated operable unit.

Additionally, the closure/postclosure implementation schedule will reflect an overall prioritization between closure/postclosure and other remedial activities within the subject operable unit, considering environmental protection, health & safety, availability of technology, etc.

Each RFI/CMS, Closure/Postclosure document will be structured such that RCRA closure/postclosure requirements can be readily identified for a separate review/approval process and so that RCRA closure/postclosure requirements can be incorporated in the RCRA Permit.

Coordination of RCRA closures/postclosures at operable units where a work plan has already been prepared will require either a revision to the work plan or an addition to a subsequent RFI/CMS document that outlines the manner in which RCRA Closure/Postclosure Plan requirements will be met in the overall sequence of documents.

The purpose of coordinating RCRA closure/postclosure requirements with CERCLA or RCRA Past Practice requirements is to ensure consistent, effective, and non-duplicative cleanup. USDOE, EPA and Ecology have agreed to a number of early attempts (the N Area Pilot Project, 200-BP-11) to determine whether this approach to satisfying RCRA and CERCLA requirements is viable. Each of the parties reserve their right to reject this approach if that party believes that it does not adequately ensure compliance with applicable requirements. If rejected, the parties agree to negotiate acceptable document submittal schedules.

4. REMAINING 200 NPL AREA:

MILESTONE	DESCRIPTION	DATE
M-13-10	Submit 200-PO-1 RFI/CMS Work Plan.	10/31/95
M-13-13	Submit 1 200 NPL RI/FS (RFI/CMS) Work Plan.	12/31/98
M-13-00K	Submit 2 200 NPL RI/FS (RFI/CMS) Work Plans.	12/31/2000
M-13-00L	Submit 3 200 NPL RI/FS (RFI/CMS) Work Plans.	12/31/2001
M-13-00M	Submit 3 200 NPL RI/FS (RFI/CMS) Work Plans.	12/31/2002
M-13-00N	Submit 3 200 NPL RI/FS (RFI/CMS) Work Plans.	12/31/2003
M-13-00O	Submit 3 200 NPL RI/FS (RFI/CMS) Work Plans.	12/31/2004
M-13-00P	Submit 4 200 NPL RI/FS (RFI/CMS) Work Plans.	12/31/2005
M-13-00Q	Submit 4 200 NPL RI/FS (RFI/CMS) Work Plans.	06/30/2006

The preceding commitments allow more resources to be applied in the 100 and 300 NPL Areas remediation efforts, while maintaining investigation/characterization plans for the 200 NPL Area to support remedial actions under M-16-00.

Description/Justification of Change (continued)

5. LEAD REGULATORY AGENCY AND UNIT CATEGORY DESIGNATIONS:

Lead Regulatory Agency and Unit Category designations are also modified for the following operable units as shown:

<u>Operable Unit</u>	<u>Current Lead Agency</u>	<u>Proposed Lead Agency</u>	<u>Proposed Unit Category</u>
200-PO-1	Ecology CPP	Ecology	RPP
200-PO-4	Not Designated	Ecology	RPP
200-IU-3	Not Designated	Ecology	RPP
200-RO-1	Not Designated	Ecology	RPP
200-PO-5	Not Designated	Ecology	RPP
200-SO-1	Not Designated	Ecology	RPP

6. COLUMBIA RIVER:

Under change number M-13-93-06, a milestone was established (M-13-80B) to submit a Columbia River Comprehensive Impact Assessment to EPA and Ecology (Human Health and Environmental Risk Assessment). USDOE, EPA, and Ecology propose this milestone (M-13-80B) be placed under M-15-00. Therefore, the following will occur:

1. Establish milestone M-15-80, to replace M-13-80B (use existing language);
2. Delete M-13-80B.